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1 sorts of classes or courses in commercial art or  
2 painting?  
3 A. No.  
4 Q. Do you have any professional certifications  
5 at all?  
6 A. No.  
7 Q. Have you had any classes or courses in  
8 computer art, computerized art or anything of that  
9 sort?  
10 A. No.  
11 Q. Based on your testimony, I take it at some  
12 point commercial art became much more associated  
13 with computers; is that correct?  
14 A. For the most part, yes.  
15 Q. How did -- well, during the course of your  
16 work over the intervening years, have you worked on  
17 computers as part of doing graphic arts work?  
18 A. Yes.  
19 Q. How did you learn to work on the computers?  
20 A. At Honeywell.  
21 Q. Take any courses at all?  
22 A. No, it was basically self-instruction.  
23 Q. Are you familiar with Gavin Studios?  
24 A. Yes.

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1 Q. What is Gavin Studios?  
2 A. It's a freelance art service.  
3 Q. What type of service does it perform?  
4 A. Graphic arts, painting, design work.  
5 Q. Is that a corporation at all?  
6 A. No.  
7 Q. Is it partnership?  
8 A. No.  
9 Q. Do you know what type of business  
10 organization it is?  
11 A. What do you mean?  
12 Q. Did you file any formal papers with the  
13 state or local government in connection with the  
14 business known as Gavin Studios?  
15 A. I'm not sure I understand what you mean.  
16 Tax papers?  
17 Q. No, let me ask the question to make it  
18 clearer. Is Gavin Studios something you created?  
19 A. Not at first.  
20 Q. To your knowledge, when did Gavin Studios  
21 come in to be?  
22 A. Came in to be when I was called back to  
23 Honeywell to do some work, and they gave me a name  
24 of Gavin Associates.

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1 Q. When was that?  
2 A. 1979.  
3 Q. You say "they gave me the name Gavin  
4 Associates," who was it specifically?  
5 A. John Haskell with the art department.  
6 Q. The art department of Honeywell?  
7 A. Of Honeywell.  
8 Q. When you say he gave you the name, what do  
9 you mean?  
10 A. He just gave me the name. He wrote it down  
11 on the purchase orders.  
12 Q. To your knowledge, was there a business  
13 known as Gavin Associates at that time?  
14 A. No, I did not.  
15 Q. You didn't know of any such business?  
16 A. Not at that time.  
17 Q. And at some time did you actually create a  
18 business known as Gavin Associates?  
19 A. Yes.  
20 Q. When was that?  
21 A. The same time. I -- same time.  
22 Q. So this is approximately 1979?  
23 A. Yes.  
24 Q. And you never incorporated Gavin Associates?

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1 A. No.  
2 Q. Was anybody else involved in the creation of  
3 Gavin Associates?  
4 A. No.  
5 Q. Did Gavin Associates have an address?  
6 A. Yes.  
7 Q. What was the address?  
8 A. 268 Orchard Street, Millis, Massachusetts.  
9 Q. Now, I think your testimony was that you  
10 moved to that address in 1983; is that correct?  
11 A. Yes.  
12 Q. Was Gavin Associates created before 1983?  
13 A. Yes.  
14 Q. Was there an address before the Millis  
15 address?  
16 A. Yes.  
17 Q. What was that address?  
18 A. It was 140 Medford Street, Arlington,  
19 Massachusetts.  
20 Q. Was that your home address at that time?  
21 A. It was my home address, yes.  
22 Q. What did you do in connection with the  
23 creation of Gavin Associates?  
24 MR. WILGOREN: Objection. You can



<p style="text-align: right;">Page 54</p> <p>1 A. Correct.</p> <p>2 Q. How long a period of time was that?</p> <p>3 A. I'm not sure exactly. No more than a few</p> <p>4 months.</p> <p>5 Q. Did Mr. Haskell call you on the phone?</p> <p>6 A. Yes.</p> <p>7 Q. Do you recall what he said?</p> <p>8 A. I don't remember his exact words.</p> <p>9 Q. Did you in fact enter into a relationship</p> <p>10 with Honeywell after that conversation? Yes, after</p> <p>11 that conversation.</p> <p>12 A. Yes, yeah.</p> <p>13 Q. Did you have any discussions with</p> <p>14 Mr. Haskell before you returned to work?</p> <p>15 A. Only when he called me to come in.</p> <p>16 Q. Did he tell you the types of projects?</p> <p>17 A. It was the same work.</p> <p>18 Q. When you say "the same work," what do you</p> <p>19 mean?</p> <p>20 A. The work that I was working on when I left</p> <p>21 was the same work that I worked on when I came back.</p> <p>22 Q. You said Mr. Haskell's department was</p> <p>23 responsible for technical illustrating; is that --</p> <p>24 do I have that correct?</p>	<p style="text-align: right;">Page 56</p> <p>1 MR. WILGOREN: Objection. Calls for</p> <p>2 legal conclusion.</p> <p>3 Q. Were you classified as an employee?</p> <p>4 A. I'm not sure how they classified me.</p> <p>5 Q. How did you get paid?</p> <p>6 A. By check.</p> <p>7 Q. Was it payroll check?</p> <p>8 A. It was a company check.</p> <p>9 Q. Do you know if it was a payroll check?</p> <p>10 A. I have no idea.</p> <p>11 Q. Do you know if there were tax deductions</p> <p>12 taken out of the check?</p> <p>13 A. Oh, there were no tax deductions.</p> <p>14 Q. Did you have any discussion with Mr. Haskell</p> <p>15 as to the basis upon which you would be returning to</p> <p>16 Honeywell?</p> <p>17 A. I'm not sure what you mean.</p> <p>18 Q. At the time you left, you were an employee,</p> <p>19 correct?</p> <p>20 A. Correct.</p> <p>21 Q. You came back. Did you have an</p> <p>22 understanding at all that your status was different?</p> <p>23 MR. WILGOREN: Objection.</p> <p>24 A. Different in the sense that I wasn't an</p>
<p style="text-align: right;">Page 55</p> <p>1 A. Yes.</p> <p>2 Q. What is that used for, if I may ask?</p> <p>3 A. It was more than technical illustration.</p> <p>4 Illustration was part of it. It was pasting up and</p> <p>5 producing camera ready artwork for their tech</p> <p>6 manuals, product briefs. Anything that the company</p> <p>7 used for publication for themselves.</p> <p>8 Q. But that's internal publication?</p> <p>9 A. Internal publications.</p> <p>10 Q. You said there were a couple of projects he</p> <p>11 wanted you to work on, correct?</p> <p>12 A. Correct.</p> <p>13 Q. Those weren't projects you had been working</p> <p>14 on prior to the time you left; is that fair to say?</p> <p>15 A. Not the same projects, no.</p> <p>16 Q. What was the relationship upon your return</p> <p>17 to work for Honeywell?</p> <p>18 MR. WILGOREN: Objection.</p> <p>19 MR. DONOGHUE: I'll withdraw the</p> <p>20 question and re-ask the question.</p> <p>21 Q. At the time you left Honeywell in 1979, you</p> <p>22 were an employee, correct?</p> <p>23 A. Yes.</p> <p>24 Q. When you came back, were you an employee?</p>	<p style="text-align: right;">Page 57</p> <p>1 employee.</p> <p>2 Q. Okay.</p> <p>3 A. At least in their eyes.</p> <p>4 Q. You had that understanding when you came</p> <p>5 back?</p> <p>6 A. Yes.</p> <p>7 Q. How did you have that understanding?</p> <p>8 A. I'm not sure -- how did I have an</p> <p>9 understanding?</p> <p>10 Q. Okay, did Mr. Haskell tell you that before</p> <p>11 you returned?</p> <p>12 A. He didn't tell me anything, really.</p> <p>13 Q. How did you learn that you were no longer</p> <p>14 considered by Honeywell to be an employee?</p> <p>15 A. They created purchase orders.</p> <p>16 Q. All right. Who were those purchase orders</p> <p>17 directed to?</p> <p>18 A. To me.</p> <p>19 Q. Personally?</p> <p>20 A. To the company.</p> <p>21 Q. Which company?</p> <p>22 A. Gavin Studio -- Gavin Associates at the</p> <p>23 time.</p> <p>24 Q. Somehow you had to know about Gavin</p>



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